

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**ERICSSON INC., and
TELEFONAKTIEBOLAGET LM
ERICSSON,**

Plaintiffs and Counter-Defendants,

v.

**TCL COMMUNICATION
TECHNOLOGY HOLDINGS LTD.,
TCT MOBILE LIMITED, and
TCT MOBILE (US), INC.,**

Defendants and Counter-Claimants.

Case No. 2:15-cv-11

**DECLARATION OF MICHAEL
MURPHY IN SUPPORT OF
DEFENDANTS' RESPONSIVE CLAIM
CONSTRUCTION BRIEF**

JURY TRIAL DEMANDED

I, Michael Murphy, declare as follows.

1. I am an attorney of record in this case to Defendants TCL Communications Technology Holdings Ltd., TCT Mobile Limited, and TCT Mobile (US), Inc. If called as a witness, I could and would competently testify to all facts within my personal knowledge.

2. Attached as Exhibit 1 is a true and correct copy of excerpts from the certified file history for United States Patent Application No. 08/886,244, which issued as United States Patent No. 6,029,052 (“the ’052 patent”).

3. Attached as Exhibit 2 is a true and correct copy of excerpts of the cross examination transcript of Dr. Steven Goldberd, technical expert for Samsung Electronics America, Inc., Samsung Telecommunications America LLC, and Samsung Co. Ltd., from International Trade Commission (“ITC”) Investigation No. 337-TA-862 filed by Ericsson Inc. and Telefonaktiebolaget LM Ericsson, entitled *Certain Electronic Devices, Including Wireless Communication Devices, Tablet Computers, Media Players, and Televisions, and Components Thereof*.

4. Attached as Exhibit 3 is a true and correct copy of the “Joint List of Disputed Terms for Construction,” Dkt. No. 507489, from International Trade Commission Investigation No. 337-TA-862, and Ex. A to same, filed April 12, 2013.

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5. Attached as Exhibit 4 is a true and correct copy of the “Markman Joint Proposed Claim Construction Chart,” from International Trade Commission Investigation. No. 337-TA-583, filed April 23, 2007.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 28 day of August, 2015 at San Diego, California.

/s/ Michael Murphy

Michael Murphy

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